

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2019-224-E
DOCKET NO. 2019-225-E

In the Matter of:)	DUKE ENERGY CAROLINAS, LLC’S
)	AND DUKE ENERGY PROGRESS,
South Carolina Energy Freedom Act)	LLC’S SECOND SET OF REQUESTS
(House Bill 3659) Proceeding Related)	FOR PRODUCTION OF
to S.C. Code Ann. Section 58-37-40)	DOCUMENTS AND
and Integrated Resource Plans for)	INTERROGATORIES TO NATURAL
Duke Energy Carolinas, LLC and)	RESOURCES DEFENSE COUNCIL,
Duke Energy Progress, LLC)	SOUTHERN ALLIANCE FOR
)	CLEAN ENERGY, SIERRA CLUB,
)	SOUTH CAROLINA COASTAL
)	CONSERVATION LEAGUE AND
)	UPSTATE FOREVER

Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (together, “Duke Energy” or the “Companies”), by and through their legal counsel, pursuant to Rule 103-833(C) of the Rules of Practice and Procedure of the South Carolina Public Service Commission, hereby serves Natural Resources Defense Council, Southern Alliance Clean Energy, Sierra Club, South Carolina Coastal Conservation League, and Upstate Forever (“Environmental Parties”) with the following Second Set of Requests for Production and Interrogatories to be answered under oath on or before twenty (20) days from the date of service.

Further, please take notice that these Requests for Production and Interrogatories (which may individually or together be herein referred to as “Request” or “Requests”) are continuing in nature until the date of the hearing, and that any information or responsive materials identified after your responses have been served upon the undersigned counsel

should be provided via supplemental discovery responses as soon as possible after such identification.

INSTRUCTIONS

1. Please produce the requested documents as they are kept in the usual course of business or to organize and label them to correspond with the categories in the Request. Documents attached to each other should not be separated.

2. In producing Documents, furnish all documents known or available to you, regardless of whether such documents are possessed directly by you or your agents, employees, representatives, investigators, or by your attorneys. All requests for Documents specifically request documents of Environmental Parties as well as Wilson Energy Economics, James F. Wilson, who you have retained to provide expert testimony in this proceeding.

3. If any document otherwise responsive to any Request was, but is no longer, in your possession, subject to your control or in existence, identify each document by listing its author(s) and addressee(s), date, subject matter, whether the document(s) or copies are still in existence (and if so, their locations and the custodians), as well as whether the document is missing or lost, has been destroyed, has been transferred voluntarily to others, or has been otherwise disposed of. In each instance, explain the circumstances surrounding such disposition and identify the person(s) directing or authorizing its destruction or transfer, and the date(s) of such direction or authorization.

4. If a privilege or objection as to any Request is claimed, identify with specificity the matter as to which the privilege or objection is claimed, the nature of the

privilege or objection, and the legal and factual basis for each such claim, and provide a complete description of the information or document being withheld.

5. Unless otherwise stated, the relevant time period for these Requests is from January 1, 2018 to the present, as updated based upon the continuing nature of these Requests.

6. Each Request shall be reproduced at the beginning of the response thereto.

7. Please provide copies of the information responsive to each Request in native electronic working format with all data and formulas intact.

8. Please provide responses to the following Requests electronically. To the extent this is impracticable, the responses, including any responsive Documents, should be provided at the offices of Robinson, Gray, Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201, or some mutually convenient location otherwise agreed to by the parties.

DEFINITIONS

1. **“Commission”** means the Public Service Commission of South Carolina.

2. **“Communication”** means the transmittal of information in the form of facts, ideas, documents, inquiries, or otherwise, including every discussion, conversation, conference, or telephone call.

3. **“You”** and **“your”** means the Environmental Parties and your witnesses in this proceeding, including but not limited to, Energy Futures Group, and Wilson Energy Economics, and all of their respective members, agents, representatives and attorneys.

4. **“Dockets”** means Commission Docket Nos. 2019-224-E and 2019-225-E.

5. The term **“document”** is to be construed as broadly as permissible under Rule 34 of the South Carolina Rules of Civil Procedure and includes, but is not limited to,

any printed, typewritten, handwritten or otherwise recorded information of whatever character, including, but not limited to, letters, memoranda, notes, diaries, reports, records, calendars, charts, audio and/or video tapes or discs, and photographs; computer programs or disks; electronic media records, however recorded and maintained, including, but not limited to, electronic mail, voicemail messages, digital photographs and electronically scanned records of any type; recorded observations, statements, conversations or formal affidavits. Any carbon or photocopy of any such materials upon which notations have been made and all drafts are also included.

6. **“Person”** means any natural person or any business, legal, or governmental entity or association.

7. The terms **“related to”** and **“relating to”** or any variation thereof shall be construed to include refer to, summarize, reflect, constitute, contain, embody, mention, show, comprise, evidence, discuss, describe, comment on, concerning, regarding, eluding to, pertaining to, probative of, in connection with, dealing with, in respect of, about, involved, identifying or proving.

8. **“Identify,”** when referring to a Person, means to give, to the extent known, the Person’s full name, present or last known address, and when referring to a natural Person, additionally, the present or last known place of employment.

9. **“Identify,”** when referring to Documents, means to give, to the extent known, the (i) type of Document; (ii) general subject matter; (iii) date of the Document; and (iv) authors, addressees and recipients.

10. **“Identify,”** when referring to an oral Communication, means to give, to the extent known, the identity of the speaker and of each Person who was present when the Communication was spoken, and the substance, date, and place of such Communication.

INTERROGATORIES

2-1. Referring to Page 19 of Exhibit B to Mr. Wilson’s testimony, which states “note that the values for 2018 (the year of the Winter Peak Study’s Study Peak Day) are well above (about 5% above) the normal winter peak for both DEC and DEP. The Study Peak Day is indeed an unusually high winter peak load[,]” please explain:

- a. Why you consider 5% to be “well above” normal winter peak load.
- b. The basis for your contention that a winter peak load 5% greater than normal peak load is “an unusually high winter peak load.”

ANSWER:

2-2. As provided in the instructions to these Interrogatories, if a privilege or objection as to any Request is claimed, identify with specificity the matter as to which the privilege or objection is claimed, the nature of the privilege or objection, the legal and factual basis for each such claim, and a complete description of the information or document being withheld.

ANSWER:

REQUESTS FOR PRODUCTION

2-1. Please produce any and all documents identified, referred to, or relied upon in preparing your response to Duke Energy's Second Set of Interrogatories to the Environmental Parties.

RESPONSE:

2-2. Referring to page 4 of Exhibit B to Mr. Wilson's testimony, which states "the RA Studies model winter peak loads over 13%, and over 4,400 MW, in excess of the highest load on the Study Peak Day, and these extreme loads drive the RA Study results[,]" please provide any and all workpapers or other documents which support this statement.

RESPONSE:

2-3. Referring to Page 19 of Exhibit B to Mr. Wilson's testimony, which states "note that the values for 2018 (the year of the Winter Peak Study's Study Peak Day) are well above (about 5% above) the normal winter peak for both DEC and DEP. The Study Peak Day is indeed an unusually high winter peak load[,]" please provide any and all workpapers or other documents which support this statement.

RESPONSE:

2-4. Referring to Exhibit B to Mr. Wilson's testimony, please provide any and all workpapers or other documents which support the statements and conclusions articulated in Paragraphs 48-54 and 89.

RESPONSE:

2-5. As provided in the instructions to these Requests, if a privilege or objection as to any Request is claimed, identify with specificity the matter as to which the privilege or objection is claimed, the nature of the privilege or objection, the legal and factual basis for each such claim, and a complete description of the information or document being withheld.

RESPONSE:

Dated this 3rd day of March 2021.

/s/ Heather Shirley Smith
 Heather Shirley Smith
 Deputy General Counsel
 Duke Energy Carolinas, LLC
 Duke Energy Progress, LLC
 40 W. Broad Street, Suite 690
 Greenville, South Carolina 29601
 Phone: (864) 370-5045
 Email: heather.smith@duke-energy.com

Rebecca J. Dulin
 Associate General Counsel
 Duke Energy Carolinas, LLC
 Duke Energy Progress, LLC
 1201 Main Street, Suite 1180
 Capital Center Building
 Columbia, South Carolina 29201
 Phone: (903) 988-7130
 Email: rebecca.dulin@duke-energy.com

and

Samuel Wellborn
 Robinson, Gray, Stepp & Laffitte, LLC
 1310 Gadsden Street
 Columbia, South Carolina 29201
 Phone: (803) 231-7829
 Email: swellborn@robinsongray.com

*Attorneys for Duke Energy Carolinas, LLC
 and Duke Energy Progress, LLC*